



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

August 12, 2025

**BY ECF**

Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:    *United States v. Alberto Tavarez-Chavier et al., 25 Cr. 77 (AS)***

Dear Judge Subramanian:

The Government submits this letter with the consent of defense counsel for Alberto Tavarez-Chavier and Rufino Lopez, to respectfully request an approximately 60-day adjournment of the conference currently scheduled for August 19, 2025, in the above-captioned matter. An adjournment of the August 19 conference would allow additional time for the defense to review produced discovery materials, which are voluminous, and for the parties to discuss a potential resolution. Specifically, the parties request that the Court adjourn the conference until the week of October 20, 2025. The parties are available the morning of October 22 and any time on October 23 and 24.

In addition, the Government respectfully requests, with the consent of the defendants, that the time between August 19, 2025, and the date of the adjourned conference, be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of the public and the defendants in a speedy trial, as the proposed exclusion will allow additional time for the defense to review discovery and the parties to discuss the possible resolution of this case, if any.

The application is GRANTED. The conference will be adjourned to Friday, October 24, 2025, at 10:00 AM.

IT IS FURTHER ORDERED that the time between August 19, 2025, and October 24, 2025, be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the defense to review discovery and the parties to discuss a potential pretrial resolution of this case.

SO ORDERED.

cc:    Counsel of record (by ECF)

Respectfully submitted,

JAY CLAYTON  
United States Attorney

  
Varun A. Gumaste  
Assistant United States Attorney  
(212) 637-1023

  
Arun Subramanian, U.S.D.J.  
Dated: August 14, 2025